

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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CUREN ESSEX, ALICIA BULKO,  
SUSAN COOK, ELIZABETH ZUBOR,  
and SUSAN TERRELL,  
Plaintiff,

V

CASE NO. 09-11095  
HON. ARTHUR J. TARNOW

LIVINGSTON COUNTY, a municipal corporation,  
ROBERT BEZOTTE in his individual capacity as  
the Livingston County Sheriff, TOM CREMONTE  
in his individual capacity as the Livingston County  
Jail Administrator, and RANDY BOOS, in his  
individual capacity, Jointly and Severally,  
Defendant.

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PLAINTIFF SUSAN TERRELL'S BRIEF IN SUPPORT  
OF HER SEPTEMBER 9, 2011 SUPPLEMENT TO HER  
JULY 29, 2011 AMENDED MOTION TO COMPEL DEFENDANTS  
TO FILE RESONSIVE ANSWERS TO HER MARCH 7, 2011  
FIRST SET OF INTERROGATORIES AND REQUEST FOR  
PRODUCTION OF DOCUMENTS

## **STATEMENT OF FACTS**

The facts upon which the Plaintiff's supplement to her July 29, 2010 motion is based are set forth in the body of that supplement.

## **ARGUMENT AND CASES CITED**

The arguments offered and the cases upon which Plaintiff's supplement is based are also set out in the body of the supplement. Those cases are:

1. National Fire Insurance Co of Hartford v Jose Trucking Corp  
264 F.R.D. 233, 238 (W.D. D.C. 2010) Page 6
2. Day v Boston Edison Co  
150 F.R.D. 16 (D.C. Mass 1993) Page 6
3. Kingsway Press Inc v Farrell Pub. Corp  
30 F Supp 775 (S.D. PA 1939) Page 6
4. Hoffman v Wilson Line, Inc  
7 F.R.D. 73 (E.D. Pa 1946) Page 6

## **RELIEF REQUESTED**

Plaintiff Susan Terrell, through her attorneys, respectfully asked this court to enter an order directing the Defendants to file responsive answers to those of Plaintiff's March 7, 2011 Interrogatories and Request For Documents, as described in the July 29, 2011 motion and the September 9, 2011 Supplement to that motion. Plaintiff's counsel also respectfully requests that the court recommend to the trial judge that the Defendant's Motion for Summary Judgment be adjourned until the Plaintiffs have been provided with the information they have sought, and have been allowed a reasonable time to evaluate and conduct further inquiries about that information, after it has been provided.

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Respectfully submitted.  
this 9th day of September 2011.

/s/ Kenneth G. McIntyre

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